

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF INDIANA  
NEW ALBANY DIVISION

IN RE:	)	Chapter 11
	)	
EASTERN LIVESTOCK CO., LLC	)	Case No. 10-93904-BHL-11
	)	
Debtor.	)	Hon. Basil H. Lorch III

**AGREED MOTION TO CONTINUE NOVEMBER 15, 2011 HEARING ON  
THE KREMLIN ISSUE AND THE DISPOSITIVE ISSUE**

James A. Knauer ("Trustee"), Brent Kuehny d/b/a Dollar K Cattle Co. ("Kuehny"), The Bank of Kremlin ("Kremlin"), Stockman Oklahoma Livestock Marketing, Inc. ("SOLM"), Crumpler Bros. ("Crumpler"), Fifth Third Bank ("Fifth Third"), and J&F Oklahoma Holdings, Inc. ("J&F," collectively with the Trustee, Kuehny, Kremlin, SOLM, Crumpler, and Fifth Third, the "Parties"), all by respective counsel, respectfully request that the Court enter an order continuing the hearing currently scheduled for November 15, 2011 ("Hearing") on the Kremlin Issue<sup>1</sup> and the Dispositive Issue until the next scheduled omnibus hearing<sup>2</sup>.

Pursuant to the *Order Granting Trustee Authority To 1) Collect Receivable, 2) Hold Receivable Proceeds In Segregated Account Pending Determination Of Rights Therein, 3) Transfer Receivable Proceeds To Operating Account After Such Determination And 4) Continuing Briefing Schedule On The Foregoing* (Docket No. 778) ("Order"), arguments on rights in or to the Receivable Proceeds, including the Kremlin Issue and the Dispositive Issue, were scheduled to be heard by the Court at the Hearing. However, response briefs on both the Dispositive Issue and the Kremlin Issue are not due until November 14, 2011.

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<sup>1</sup> Capitalized terms not defined herein shall have the meaning ascribed to such terms in the Order identified below.

Because the November 14, 2011 briefing deadline does not allow sufficient time for the Court and interested parties to review the filed briefs, and because the Parties need additional time to prepare for oral argument on both the Kremlin Issue and the Dispositive Issue, the Parties request that this Court continue the Hearing until the next scheduled omnibus hearing.

WHEREFORE, the Parties respectfully request that the Court enter an order continuing the Hearing until December 14, 2011 at 10:00 a.m. EST and granting the Parties all other just and proper relief.

Respectfully submitted,

By: /s/ Dustin R. DeNeal

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<sup>2</sup> The next omnibus hearing scheduled in this chapter 11 case is set for December 14, 2011 at 10:00 a.m. EST.

**CERTIFICATE OF SERVICE**

I hereby certify that on November 11, 2011, a copy of the foregoing pleading was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System. Parties may access this filing through the Court's system.

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